

Agenda Item 16

Please insert this document after page 8

WAC 232-12-068 Nontoxic shot requirements

SUMMARY OF SUPPLEMENTAL WRITTEN PUBLIC INPUT

Supplemental public comments were not captured in the original summary of written comments. Each comment may be representative of multiple like comments.

COMMENTS	AGENCY RESPONSE
Support	
Please make all WDFW lands limited to nontoxic shot for all hunting in 2011. In particular, please limit the new wildlife areas in Oakville and Ebey Island to nontoxic shot in 2009. These are important wintering areas for waterfowl. I also ask that only nontoxic shot be permitted for trap and target shooting on WDFW lands where this type of shooting is allowed.	<p>Thank you for your comment.</p> <p>The two areas mentioned do not have significant hunting opportunities related to the species identified in this recommendation. However, the Ebey Island parcel is already included as it is part of the Snoqualmie Wildlife Area.</p> <p>This proposed regulation is strictly for hunting. Expansion of areas for further restrictions for target shooting on WDFW lands would need to be presented at a different time. The existing restrictions in section 2 would remain.</p>
I come from a hunting and gun-owning family, and do not oppose this type of recreation. I support responsible recreation. Please confirm the rules requiring broader use of non-toxic shot.	<p>Thank you for your comment.</p>
Oppose – Scientific Evidence	
The CDC wrote a paper related to the North Dakota Department of Health inquiry on lead fragments in game meat donated to food banks. This report proves that hunting with lead is safe for humans.	<p>The study conducted by the CDC did not prove that hunting with lead was safe for humans. The report did state that those who ate meals of game shot with lead had a blood lead concentration lower than 10 micrograms per deciliter, the level at which the CDC recommends case management. However, the results of the study showed that those who ate game shot with lead ammunition had a significantly higher blood lead level than those who did not.</p> <p>The following is a link to the CDC report as posted by the National Shooting Sports Foundation. http://www.nssf.org/share/PDF/ND_report.pdf</p>
The ban of lead shot for waterfowl hunting has not resulted in any benefits and neither would a ban on lead shot for upland game hunting in Washington.	<p>There are studies published that show that the non-toxic shot requirement for waterfowl has resulted in fewer lead poisoning events in waterfowl.</p>

COMMENTS	AGENCY RESPONSE
Oppose – General Comments	
<p>I believe the current policy addresses the problem of "hot spots" adequately and in a reasonable manner. I submit that most game lands in Washington, such as the LT Murray, the Quilomene, etc, are not subject to lead "hot spots" like a small pheasant release site. Logically, there is a distinct difference in several hundred hunters shooting day after day in a release site like the VOA and a few hunters chasing chukars in the Quilomene and firing only a few shots in a vast area.</p>	<p>The current proposal adds another site to the existing list of sites where non-toxic shot is required. Additional proposed areas (for 2010 and 2011) are aimed at reducing overall lead deposition on WDFW owned and managed lands and is consistent with managing lands for healthy and diverse fish and wildlife populations. In addition, hunter densities on WDFW managed lands tend to be much higher than other lands resulting in deposition of lead over time.</p>
<p>In 1993, I conducted an experiment in one of my own pheasant flight pens by spreading 15 pounds of 71/2 lead shot across the pen, releasing 8 pheasants into the pen and analyzing stools for lead shot. Birds were held for 22 weeks. No birds died and no shot was found in the stools.</p>	<p>The typical method used to evaluate lead exposure is blood lead level or lead levels in the liver of an animal. In addition, crop contents are usually analyzed instead of stool samples as pellets would not likely be passed through a bird's digestive system and be readily identifiable. That said, it is not unreasonable to have no birds die as increased lead levels do not necessarily result in death of the individual.</p>
<p>I can understand the use of nontoxic shot in areas that are frequented by water fowl, but not in the remote areas where I hunt pheasant and quail in E. WA. Please do not approve any regulation that would require the use of nontoxic shot on upland birds on a statewide basis.</p>	<p>Those areas of highest hunter density are being identified. Other areas are proposed to be phased in, but on WDFW owned property only. This is not a statewide proposal for all public and private lands.</p>
<p>Public meetings were not held at the right time of year and those without email did not get notified of these rules changes. This was not good public involvement.</p>	<p>Actually, the public involvement process started back in June of 2008 and included news releases, emails, and direct mail to those who contacted the agency asking to be on our mailing list (about 800 people). There was a second comment period in August and September which included public meetings. This is the third comment period and is now focused on specific recommendations developed using the information gathered during the first two phases. All of this process was also included on our web site, which contains a summary of the entire process.</p>
<p>After 51 years of hunting, I have not known anyone to die from eating birds shot with lead shot, nor have I ever found a bird dead from lead poisoning.</p>	<p>Increased blood lead levels do not always result in someone or some animal dying. Studies have shown that increased blood lead has sub-lethal effects, (e.g., changes in behavior or brain function) that may not be easily identified.</p>
<p>The "Green Sheet" states that "Adoption is planned for the April 2-3-4, 2009 Commission meeting in Olympia". This indicates that the decision has already been made by the Department of Fish and Wildlife and that the Commission is merely going through the motions. I find this kind of language offensive.</p>	<p>The intent of the statement is that public comments are being accepted at the March meeting and the Commission will not make a decision until the April meeting. We will review the language to make it more acceptable in the future.</p>